

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

	X	
MILLENNIUM FUNDING, INC., <i>et al.</i> ,	:	
	:	
Plaintiffs,	:	
	:	
-against-	:	
	:	
SURFSHARK LTD., KEEPSOLID, INC. d/b/a/ VPN	:	
UNLIMITED, ZENGUARD GMBH, EXPRESS VPN	:	No. 1:21-CV-00643 RDA/MSN
INTERNATIONAL LTD (a BVI Limited Company),	:	
EXPRESS VPN INTERNATIONAL LTD (an Isle of	:	
Man Limited Company), VPN CONSUMER	:	
NETWORK and VPN CONSUMER NETWORK	:	
SERVICES,	:	
	:	
Defendants.	:	
	:	
	X	

PLAINTIFFS’ NOTICE OF WITHDRAWAL OF PROOF OF SERVICE

Plaintiffs MILLENNIUM FUNDING, INC., SCREEN MEDIA VENTURES, LLC, VOLTAGE HOLDINGS, LLC, MILLENNIUM MEDIA, INC., PARADOX STUDIOS, LLC, DALLAS BUYERS CLUB, LLC, WONDER ONE, LLC, FW PRODUCTIONS, LLC, MILLENNIUM IP, INC., I AM WRATH PRODUCTIONS, INC., FAMILY OF THE YEAR PRODUCTIONS, LLC, AMBI DISTRIBUTION CORP., KILLING LINK DISTRIBUTION, LLC, BADHOUSE STUDIOS, LLC, LF2 PRODUCTIONS, INC., LHF PRODUCTIONS, INC., LAUNDRY FILMS, INC., VENICE PI, LLC, RAMBO V PRODUCTIONS, INC., SPEED KILLS PRODUCTIONS, INC., NIKOLA PRODUCTIONS, INC., BODYGUARD PRODUCTIONS, INC., OUTPOST PRODUCTIONS, INC., HITMAN 2 PRODUCTIONS, INC. and MORGAN CREEK PRODUCTIONS, INC. (collectively, “Plaintiffs”), through counsel, hereby provide notice to the Court that they withdraw, and by this notice hereby do withdraw, the returned and executed summons (ECF No. 28) served upon Defendant Surfshark Ltd. (“Surfshark”). Plaintiffs further withdraw any proof of service established by that summons.

In lieu of service, Surfshark has executed the waiver of service form executed outside of the United States filed concurrently herewith, which Plaintiffs accept for purposes of establishing service of the Amended Complaint (ECF No. 12) and Surfshark's deadline to respond to the Amended Complaint. With submission of the attached Waiver of Service, Surfshark's deadline to respond to the Amended Complaint is December 16, 2021.

Dated: October 1, 2021

MILLENIUM FUNDING, INC., *et al.*

By: /s/ Kerry S. Culpepper

Kerry S. Culpepper,

Virginia Bar No. 45292

Counsel for Plaintiffs

CULPEPPER IP, LLC

75-170 Hualalai Road, Suite B204

Kailua-Kona, Hawai'i 96740

Tel.: (808) 464-4047

Fax.: (202) 204-5181

kculpepper@culpepperip.com

CERTIFICATE OF SERVICE

I hereby certify that on the October 1, 2021, the foregoing was electronically filed and served on all counsel of through the Court's CM/ECF system, in accordance with the Court's electronic case filing policies and procedures.

By: /s/ Kerry S. Culpepper
Kerry S. Culpepper,
Virginia Bar No. 45292
Counsel for Plaintiffs
CULPEPPER IP, LLC
75-170 Hualalai Road, Suite B204
Kailua-Kona, Hawai'i 96740
Tel.: (808) 464-4047
Fax.: (202) 204-5181
kculpepper@culpepperip.com